

**ATTACHMENT A**

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

I, Frank H. Figgers, III, Task Force Officer, United States Postal Inspection Service, having been duly sworn under oath, state as follows:

1. Your affiant is a certified police officer employed full time with the Virginia State Police and holds the rank of Special Agent. I am currently assigned as a Task Force Officer with the United States Postal Inspection Service (“USPIS”) in the Roanoke, Virginia Domicile. I am authorized to investigate criminal and civil matters related to the United States Postal Service and the mails; serve warrants and subpoenas; make arrests; carry firearms; make seizures of property; administer oaths; and perform such other official duties as may be established by the Chief Postal Inspector. I have been employed as a sworn officer with the Virginia State Police since January 1989 and have worked the drug interdiction arena with the Virginia State Police since 2003. My work has included highway drug interdiction and parcel interdiction at other commercial parcel businesses. I have received formal training in conducting criminal investigations into drug trafficking and money laundering organizations that utilize the United States Postal Service (“USPS”). During my tenure as a Special Agent, I have conducted and participated in numerous investigations of criminal activity that have violated both federal and state law.

2. I know based on training and experience that the U.S. Mail is often used by drug trafficking organizations to transport controlled substances and proceeds from the sale of controlled substances. I know based on training and experience that USPS Priority Mail and Priority Mail Express are commonly used to transport controlled substances, and drug trafficking

proceeds, because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

3. This affidavit is submitted in support of an application for a search warrant of a USPS Priority Mail Express parcel bearing tracking number “EI 116 780 063 US” for controlled substances and/or the proceeds from drug trafficking. The parcel (hereafter referred to as Parcel #1) is described as follows:

- a. Addressee: Will Lepesh, 941 S Vermont Ave,  
Unit 101 Box 90, Los Angeles, CA 90036
- b. Return Address: Drew W, 104 Sunset Blvd, Blacksburg, VA 24060
- c. Postage Affixed: Origin: 24153; Postage: \$56.00; Date: JAN 11, 2022
- d. Tracking Number: EI 116 780 063 US
- e. Description: USPS Mailing Envelope 15 x 11.625 bearing a USPS Priority Mail Express label
- f. Weight: 1 pound 3 ounces

4. On January 11, 2022, Parcel #1 was identified as a suspected drug proceeds parcel during outbound interdiction and subsequently retrieved from the mail stream. Parcel #1 is a white USPS Mailing Envelope bearing a USPS Priority Mail Express label and addressed to Los Angeles, California. California is a known source area for drug parcels mailed into the Western District of Virginia and conversely, a known destination area for parcels containing drug proceeds. Parcel #1 was paid with cash and mailed from the Salem Post Office located in Salem, Virginia. A photograph of Parcel #1 is attached as Exhibit #1.

5. A search of postal records for both the sender and recipient addresses shows seven (7) other parcels were mailed to 104 Sunset Blvd, Blacksburg, Virginia 24060 from California between August 2021 to December 2021. Three (3) of these parcels were mailed from the same

ZIP code as Parcel #1. There have been three (3) prior parcels mailed from the Blacksburg / Christiansburg, Virginia area to 941 S Vermont Ave Unit 101, Los Angeles, California 90006 between October 2021 to December 2021.

6. Your affiant made inquiries via CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information. CLEAR reported an individual by the name of M.B. to be associated to the sender address, 104 Sunset Blvd., Blacksburg, VA 24060, as recently as June 2021.

7. The recipient, "Will Lepesh" was unable to be associated to the destination address of 941 S Vermont Avenue, Unit 101 Box 90, Los Angeles, California 90006. This address is a commercial mail receiving agency (CMRA) business that provides a private post office box service through the US Postal Service. Open sources on the internet do not indicate that a person with the name of "Will Lepesh" resides in Los Angeles, California. Based on your affiant's training and experience, drug traffickers will often use these businesses when mailing parcels containing drug proceeds in order to conceal the true identity or association of the involved parties from law enforcement should the parcel and proceeds be seized.

8. On January 12, 2022, your affiant requested a narcotic detection canine from the Virginia State Police (VSP). Trooper D.A. Goins, and his narcotic detection canine, "SHEA," responded to the USPS Roanoke Processing and Distribution Center located at 419 Rutherford Avenue NE, Roanoke, Virginia 24022. Parcel #1 was placed in a parcel line-up, consisting of Parcel # 1 and randomly selected parcels, and then subjected to an exterior search by Canine "SHEA." Trooper Goins advised your affiant that Canine "SHEA" positively alerted to Parcel #1 at approximately 9:30 a.m. According to Trooper Goins, this positive alert meant Canine "SHEA"

detected presence of the odor of an illegal drug emanating from Parcel #1. A supporting affidavit of the narcotics detection training completed by Trooper Goins and Canine "SHEA" is provided as Exhibit #2.

9. At this time, Parcel #1 is located at the USPIS-Roanoke Domicile in the Western District of Virginia. The parcel has been maintained unopened, in my custody, pending application for a search warrant.

10. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that the USPS Priority Mail Express parcel bearing tracking number "EI 116 780 063 US," addressed to "Will Lepesh, 941 S Vermont Ave Unit 101 Box 90, Los Angeles, California 90006" bearing a return address of "Drew W, 104 Sunset Blvd., Blacksburg, Virginia 24060" contains controlled substances, and/or the proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

Frank H. Figgers, III  
Frank H. Figgers, III  
Task Force Officer, USPIS

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means; specifically, by telephone, on the 13<sup>th</sup> day of January 2022.

Joel C. Hoppe  
The Honorable Joel Hoppe  
United States Magistrate Judge  
Western District of Virginia